

Applicant : Nathaniel M. McCully
Serial No. : 09/782,597
Filed : February 12, 2001
Page : 11 of 16

Attorney's Docket No.: 07844-412001 / P376

REMARKS

Claims 1-27 were pending. Claims 1-6, 8-19, 21-22 and 24-27 have been amended. Claims 7 and 20 have been cancelled. Claims 1, 14, and 27 are independent. The amendment to the specification at page 12 recites step S36 from FIG. 10, which was inadvertently omitted from the detailed description. No new matter is added. Reconsideration of the action mailed March 25, 2004, is requested in light of the foregoing amendments and the following remarks.

The Examiner rejected claims 1-27 under 35 U.S.C. § 112, first paragraph as failing to comply with the enablement requirement. The Examiner rejected claims 1-4, 6-7, 9, 11-12, 14-17, 19-25, and 27 under 35 U.S.C. § 112, second paragraph as lacking sufficient antecedent basis and as indefinite. The Examiner rejected claims 1-27 under 35 U.S.C. § 102(b) as being anticipated by Masahiko Muramatsu Japanese publication 06-020026 ("Muramatsu"). Applicant respectfully traverses the rejections.

Section 112, First Paragraph Rejections

Claim 1 stands rejected as failing to comply with the enablement requirement. Applicant has amended claim 1 to clarify the method steps and to provide clearer antecedent basis. Applicant respectfully submits that the rejection to claim 1, as well as the rejection claims 2-13, which depend from claim 1, has been overcome.

Claims 7 and 20 stand rejected as failing to comply with the enablement requirement. The Examiner states that an intersection point between an emboss and a bounding box is not described in the specification. Applicant respectfully disagrees with the Examiner's interpretation of the claims. However, Applicant has cancelled claims 7 and 20 and respectfully submits that the rejection to claims 7 and 20 is now moot.

Claims 14 and 27 stand rejected as failing to comply with the enablement requirement for the same reasons as claim 1. Applicant has amended claims 14 and 27 and respectfully submits that the rejection of claim 14 and 27, as well as claims 15-26, which depend from claim 14, has been overcome.

Applicant : Nathaniel M. McCully
Serial No. : 09/782,597
Filed : February 12, 2001
Page : 12 of 16

Attorney's Docket No.: 07844-412001 / P376

Section 102(b) Rejections

Claim 1 stands rejected as anticipated by Muramatsu. Claim 1, as amended, recites "aligning each distinct embbox with a coordination line using the determined coordination point for each of the plurality of characters to typeset the plurality of characters on the text line."

The Examiner states that paragraphs 89 and 138 as well as Figures 10-17 of Muramatsu disclose Applicants aligning step. Applicant respectfully disagrees.

The text accompanying paragraph 89 describes part of a process of repositioning a character within a reference box as part of a technique for typesetting a plurality of characters. As shown in Figure 11, each character is positioned within an identical box (translated as "Escapement W"). However, each character has a different position within each box. See Figure 11. Each Escapement W is positioned in a row such that the base of each box is aligned with the base of each adjacent box. Each box is therefore aligned based solely on a feature of the box, e.g., the bottom edge, and not using a determined coordination point for each of the plurality of characters. When the boxes are aligned, the plurality of characters must still be repositioned for typesetting because they are not aligned with respect to each other. See Figure 11, paragraph 107. In contrast, claim 1 requires that the plurality of characters are typeset once the embboxes are aligned with a coordination line. Instead, Muramatsu discloses typesetting the characters by repositioning each character within each respective Escapement W to obtain an aligned string of characters as shown in Figure 12.

Paragraph 89 discloses a step in the repositioning process described above. Specifically, paragraph 89 reads as follows:

The relocation section 70 calculates a coordinate value as movement magnitude of the direction of X of a character, and the direction of Y. Here, it considers as the movement magnitude which considered as the movement magnitude calculated by the detecting element 40 as movement magnitude of the direction of X, and defined this as X_{m1}, and calculated by the arrangement operation part 60 as movement magnitude of the direction of Y, and this is defined as Y_{m2} (step 901).

According the paragraph 89, the magnitude of the displacement of a character within Escapement W in the X direction is X_{m1} and the displacement in the Y direction is Y_{m2}. A new

Applicant : Nathaniel M. McCully
Serial No. : 09/782,597
Filed : February 12, 2001
Page : 13 of 16

Attorney's Docket No.: 07844-412001 / P376

coordinate position for the character is determined based on magnitude of X_{m1} and Y_{m2} . Thus, paragraph 89 only describes that a character is moved in the X and Y direction within Escapement W by X_{m1} and Y_{m2} . Paragraph 89 does not disclose aligning each distinct embbox with a coordination line using the determined coordination point for each of the plurality of characters.

Additionally, the Examiner cites paragraph 138, which reads, in pertinent part, as follows:

Although this migration processing (relocation) will be performed by the relocation section 1070, since the relocation processing by the relocation section 1070 is the same as that of the procedure shown in Figure 9 of the 1st example, that explanation is omitted here.

This section states that the relocation steps performed to move a character (after the magnitude of required movement in the X and Y direction has been calculated) follows the same process laid out in Figure 9. The relocation step referred to is simply the moving of the character in the X and Y direction by the calculated magnitude of X_{m1} and Y_{m2} as disclosed in paragraph 89. Paragraph 138 does not disclose aligning each distinct embbox with a coordination line using the determined coordination point for each of the plurality of characters. Applicant respectfully submits that claim 1, as well as claims 2-13, which depend from claim 1, are in condition for allowance.

Claim 6 stands rejected as anticipated by Muramatsu. As amended, claim 6 recites "determining a point on the glyph bounding box as the coordination point of said each distinct embbox."

The Examiner states that paragraph 33 discloses a coordination point. Paragraph 33 reads as follows:

In detecting element 40, the center-of gravity location is detected from the bounding box information on a capital letter "A." Here, let the intersection of the diagonal line of a bounding box be a center-of gravity location. Specifically, a bounding box can express the point shown, respectively with the value of the point shown, respectively with the value of the light bearing in descender Rhine, and the value of left bearing, and the light bearing in ascender Rhine, and the

Applicant : Nathaniel M. McCully
Serial No. : 09/782,597
Filed : February 12, 2001
Page : 14 of 16

Attorney's Docket No.: 07844-412001 / P376

value of left bearing in the rectangle field made into top-most vertices. Therefore, it can ask for the intersection of the diagonal line based on these values.

This paragraph of Muramatsu discloses a portion of a character relocation process that begins at paragraph 30. Paragraph 33 describes determining the center-of-gravity point of the bounding box surrounding a character (e.g., the capital letter "A"). The center-of-gravity point of the bounding box is the intersection of two diagonal lines drawn from opposite corners of the bounding box. *See* Figure 5. Thus, the center-of-gravity point is essentially the center point of the bounding box for a character.

The position of the center-of-gravity point of the bounding box is compared with the center point of Escapement W. *See* paragraph 35. If the center-of-gravity of the bounding box does not correspond to the center of Escapement W, the bounding box is moved such that the center-of-gravity of the bounding box has the same coordinate position as the center of Escapement W. *See* paragraphs 35-37. Each character is typeset once the bounding box has been aligned with the center of Escapement W. *See* Figure 12. Thus, the center-of-gravity point is a coordination point for a character to be aligned inside Escapement W. However, Muramatsu does not use the coordination point to align a plurality of distinct emboxes along a coordination line as required by claim 6.

The purpose of the coordination point in Muramatsu is to align the character within Escapement W, not to align a plurality of distinct emboxes along a coordination line. In Muramatsu, each Escapement W containing a character is aligned in a row. *See* Figure 11a. The characters are then centered within each Escapement W to complete the alignment process. *See* Figure 12. In contrast, claim 6, as amended, recites using a predetermined point on the bounding box as a coordination point for each embox. The coordination point is then aligned with a coordination line as in amended claim 1. Applicant respectfully submits that claim 6, as well as claim 7, which depends from claim 6, are in condition for allowance.

Claim 9 stands rejected as anticipated by Muramatsu. Claim 9, as amended, recites "determining an ideographic character face box located inside and separated from said embox edges by the average value."

Applicant : Nathaniel M. McCully
Serial No. : 09/782,597
Filed : February 12, 2001
Page : 15 of 16

Attorney's Docket No.: 07844-412001 / P376

The Examiner states that Muramatsu discloses an ideographic character face box at paragraphs 110-135. Applicant respectfully disagrees. The cited paragraphs describe another technique for adjusting the position of a character bounding box within Escapement W. The characters are aligned by comparing the character in each Escapement W with a corresponding reference character in object font memory 1040. See paragraph 113 to paragraph 116, Figures 15 and 16. The character is repositioned within Escapement W in order to match the reference character in object font memory 1040. See paragraph 116. However, the characters are disclosed as including a bounding box and not an ideographic character face box. A bounding box is distinct from a ideographic character face box. A bounding box defines the smallest rectangle that a character can fit within. An ideographic character face box is a box, typically square, surrounding a CJK character. The ideographic character face box of claim 9 is not the smallest rectangle that can surround the character. Claim 9 requires that the ideographic character face box be positioned between the bounding box and embox of a character. Muramatsu does not disclose the formation of an ideographic character face box based on the average distance between a bounding box and an embox as required by claim 9. Applicant respectfully submits that claim 9, as well as claims 7, which depends from claim 9, are in condition for allowance.

Claims 11 and 24 stand rejected as anticipated by Muramatsu. Claims 11 and 24, as amended, recite "determining an ideographic character face box located inside and separated from said embox top and bottom edges by the first average value and the embox left and right edges by the second average value." For at least the reasons set forth with respect to claim 9, claims 11 and 24 are in condition for allowance.

Claim 14 stands rejected as anticipated by Muramatsu. Claim 14, as amended, recites "align each distinct embox with the coordination line using the determined coordination point for each of the plurality of characters." For at least the reasons set forth with respect to claim 1, claim 14 as well as claims 15-26, which depend from claim 14, are in condition for allowance.

Claim 19 stands rejected as anticipated by Muramatsu. Claim 19, as amended, recites "determine a predetermined point on the glyph bounding box as the coordination point of each

Applicant : Nathaniel M. McCully
Serial No. : 09/782,597
Filed : February 12, 2001
Page : 16 of 16

Attorney's Docket No.: 07844-412001 / P376

distinct embbox." For at least the same reasons set forth with respect to claim 6, claim 19 is in condition for allowance.

Claim 22 stands rejected as anticipated by Muramatsu. Claim 22, as amended, recites "determining an ideographic character face box located inside and separated from said embbox edges by the average value." For at least the same reasons as set forth above with respect to claim 9, claim 22 is in condition for allowance.

Claim 27 stands rejected as anticipated by Muramatsu. Claim 27, as amended, recites "aligning each distinct embbox with the coordination line using the determined coordination point for each of the plurality of characters." For at least the same reasons set forth with respect to claim 1, claim 27 is in condition for allowance.

Applicant respectfully requests that all pending claims be allowed. Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 26 July, 2004

Brian J. Gustafson
Reg. No. 52,978

Fish & Richardson P.C.
500 Arguello Street, Suite 500
Redwood City, California 94063
Telephone: (650) 839-5070
Facsimile: (650) 839-5071

50214300.doc